

EXHIBIT 1



TIM POUNDS, SHERIFF

8470 Earl D. Lee Boulevard

Douglasville, GA 30134

(770) 942-2121

2023 JUL 25 PM 1:01

Copy

Civil Action No.

2023CV382935

Darnell Williams

Plaintiff

Name and Address of Party to be Served:

Byron Burnett

Postmaster

2727 Skyview DR

Lithia Springs GA 30122

VS.

Byron Burnett

Defendant

COURT DATE:

MARSHAL / SHERIFF'S ENTRY OF SERVICE

PERSONAL

☒ I have this day served the defendant of the within action and summons.

Byron Burnett

personally with a copy

NOTORIOUS

☐ I have this day served the defendant by leaving a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows:
age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

☐ Served the defendant _____, a corporation

☐ by leaving a copy of the within action and summons with _____ in charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

☐ Diligent search made and defendant not to be found in the jurisdiction of this Court.

This 31 day of July, 2023

Time:

1325

LT Graham 203

Douglas County Deputy Sheriff

IN THE Superior COURT OF Fulton COUNTY
STATE OF GEORGIA

Petitioner: Darrell R. Williams Civil Action File No: 2023CV382935
Respondent: USPS

CERTIFICATE OF SERVICE

This is to certify that I have served the foregoing Age Discrimination Retaliation
[Describe pleading being sent]

claim upon the Byron Burnett Postmaster S
[Designation of opposing party, for example, Respondent or Petitioner]

- ☐ a) By placing a copy in the United States Postal Service, with postage prepaid or
- ☐ b) By hand delivering a copy
- ☐ 1. to the opposing party who is representing him/herself without an attorney
OR
- ☐ 2. to the attorney for the opposing party

Whose name and address is listed below:

B. Burnett Postmaster Byron Burnett
2727 Skyview Dr
Lithia, Spring MA 30122

This 20 day of July, 2023.
[date] [month] [year]

Darrell R. Williams
[Sign your name]

Darrell Williams
Name [Print or Type]

253 Mucci Cir
Address Stockbridge, MA
30281

Fulton County Superior Court

EFILED

Date: 7/20/2023 2:20 PM

Che Alexander, Clerk



IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA

136 PRYOR STREET, ROOM J2 C-103, ATLANTA, GEORGIA 30303

SUMMONS

2023CV382935

Darrell R. Williams

) Case

) No.:

Plaintiff,

vs.

United States Postal
Service (USPS)

Defendant

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said Court at <https://efilega.tylerhost.net/ofswb> (unless you are exempt from filing electronically) and serve upon plaintiff's attorney, whose name and address is:

Darrell R. Williams
253 Mucci Cir
Stockbridge, GA 30281

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

7/20/2023

This _____ day of _____, 20____

Honorable Ché Alexander, Clerk of

Superior Court

Antonia Ambro

Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you _____, 20____

Deputy Sheriff

IN THE Superior COURT OF Fulton COUNTY
STATE OF GEORGIA

Darrell R Williams
Plaintiff

CIVIL ACTION NO. 2023CV382935

v. USPS/United States Postal Service
Defendant

COMPLAINT FOR Age Discrimination
Retaliation

Now comes Darrell R Williams plaintiff in the above-styled action, and states his complaint as follows:

The defendant is USPS, who is a resident of 2127 Skyview Dr. Street,
City of Lithia Springs Douglas County, Georgia, and is subject to the jurisdiction of
this court.

2. List short and plain statement in separately numbered paragraphs of claim sued upon.

① USPS allowed employees to harass Plaintiff daily by calling him derogatory names, prefacing all comments with his age. Daily taunting by same employees repeating Plaintiff's home address.

② Death threats by one of the USPS employees which was witnessed by other USPS employees and verified by USPS Human Resources Dept.

③ USPS retaliated against Plaintiff because he filed an EEOC claim. USPS asked Plaintiff to relocate to another Post Office; thus losing seniority and having a 90 day only work guarantee.

3. List statement of damages, with items of special damages stated specifically.

① Lost Wages - \$100,000

② Daily Trauma - Plaintiff is afraid daily for his life and the safety of his family. \$500,000

③ USPS did nothing to eliminate the hostile work environment - \$250,000

④ USPS Failed to follow their Zero (0) Tolerance Policy / Zero Tolerance - \$250,000

WHEREFORE, plaintiff demands judgment against defendant for the sum of \$1,100,000 together with interest and the costs of this action.

Darnell Williams
Plaintiff

253 Mucci Cir
Stockbridge, MA 01302
Address

770-896-8267
Telephone number

IN THE Superior COURT OF Fulton COUNTY
STATE OF GEORGIA

Darrell R. Williams
Plaintiff

vs
United States Postal Service
Defendant

Civil Action File No: _____

VERIFICATION

I, (your name) Darrell R. Williams, personally appeared before the undersigned
Notary Public, and say under oath that I am the (check one :) ☒ Petitioner ☐ Respondent
in the above styled action and that the facts stated in the

(Name of petition, motion, complaint) Age Discrimination Retaliation
are true and correct.

This the 20th day of July, 2023.
[day] [month] [year]

Darrell Williams
(Sign your name here in front of the Notary)

Name (print or type here): Darrell Williams
Address: 253 Bruce Cir
Stockbridge, GA 30081
Telephone number: () _____

Sworn to and subscribed before me, this
20th day of July, 2023.

Marvin Wooley
NOTARY PUBLIC
My Commission Expires: 7/21/2027



From: Darrell R. Williams
253 Gucci Cir Stockbridge, Ga 30281

To: United States Post Office
Equal Employment Opportunity Commission
Office of Federal Operations
Federal Sector Programs
P. O. Box 77960
Washington, DC 20013-8960

Re: Notice of Intent to File a Lawsuit

~~Dear~~ United States Post Office

The purpose of this letter is to provide a formal notice that ~~"Plaintiff"~~ **R. Williams** ("Plaintiff") intends to file a lawsuit against the United States Post Office ("Defendant"), and the National Association of Letter Carriers ("Defendant") due to the following reasons:

The Age Discrimination Act of 1967/1975-Title VII

- (1) Age Discrimination- Daily verbal harassment of "Plaintiff" all related to Age.
- (2) Job Obstruction-Co-workers interfering with "Plaintiff" daily job assignments.
- (3) Management Harassment-Manager assigning "Plaintiff" a City Carrier; new, unfamiliar Rural routes to him: A clear violation of the NALC collective bargaining agreement. Management on multiple occasions; then threatens "Plaintiff" about route performance as it relates to keeping his job.

- (4) **Physical Attack**- Co-worker verbally abused and physically attacked "Plaintiff"
- (5) **Death Threats**-During Co-worker attack of "Plaintiff" the attacker told "Plaintiff" that he would kill him.
- (6) **Nation Association of Letters Carriers (NALC)**
Misrepresentation

Keia Morton (USPS Management), Andre Terrell, and his followers whom are USPS employees; Wilson Cassius, Anita Scott, Tarashema Marshall, and Lynn Taylor all conspired to force "Plaintiff" to resign his position as a CCA in the Lithia Springs Post Office, by intimidation, harassment, threats, and a physical attack.

"Plaintiff has a spotless personnel record, "Plaintiff missed one day of work in a year. "Plaintiff;" despite having less time with the Post Office than Wilson Cassius, "Plaintiff" had more seniority than Wilson Cassius. The above-mentioned USPS employees discriminated against, pressured, insulted, and terrorized "Plaintiff" while also obstructing "Plaintiff" daily work routine. Keia Morton placed "Plaintiff;" a CCA (City Carrier) on Rural Routes against NALC Union rules. These new unfamiliar routes caused "Plaintiff" major delays and extended his workday by 2 or more hours. This resulted in Keia Morton constantly pressuring "Plaintiff" to complete these unfamiliar rural routes as quickly as he completed his City routes. Keia Morton at times placed "Plaintiff" on Andre Terrell's rural route, where Andre Terrell belittled "Plaintiff" for taking too much time to complete the unfamiliar rural route. Therrell constantly saying to "Plaintiff" he was a slow ass old man, a sorry ass old man.

Keia Morton was working with his friends/USPS employees listed above to force "Plaintiff" to quit in order to move Wilson Cassius into a better position to earn career status.

For approximately 45 days during the months of June and July 2022 "Plaintiff" was called derogatory names all related to "Plaintiff" age. The derogatory comments were made to "Plaintiff" by the co-workers listed above. Keia Morton was present most of the time when this type behavior was taking place. "Plaintiff" was attacked, and the attacker (Wilson Cassius) said to "Plaintiff" he would kill "Plaintiff" Old motherfucking Ass; then he said loudly, I am about that Life old ass nigger. It was shocking to "Plaintiff" to see such hate in someone eyes. Wilson Cassius and Andre Terrell had previously shouted out "Plaintiff's home address many times at

the Lithia Springs Post Office; reminding, **"Plaintiff"** that they knew where he lived.

The ringleader, Andre Terrell and his followers, Wilson Cassius, Anita Scott, Tarashema Marshal, and Lynn Taylor are all involved in this Age Discrimination and Harassment suit.

The names they called **"Plaintiff"** referenced age discrimination, i.e., **"Old Ass Ragga Muffin"** **"Old Ass Man"**; **"Old Ass Motherfucker"**; **"Your Old Ass should not be working here."** **"Plaintiff"** reported the offenses to his supervisors, **Don Bannister, Keia Morton, and Byron Burnette**, but the torment continued despite his complaints to management. In addition to the verbal abuse, **"Plaintiff"** packages were hidden by **Anita Scott**, and his trays of mail were tampered with frequently by **Lynn Taylor, Andre Terrell, and Wilson Cassius**; hiding packages and mixing up mail to impede and obstruct **"Plaintiff"** successful delivery. When untampered, the postal sorting and delivery system allows for ease of delivery. Mixing up the mail results in delivery delays, mental anguish, and provides Management with reasons to threaten **"Plaintiff"** job. On or about July 23rd, **"Plaintiff"** was attacked by one of the verbal abusers, **Wilson Cassius** and **"Plaintiff's"** life was threatened. This was witnessed by several of his colleagues all who were interviewed by USPS Human Resources, **Krystal White**. The day of the attack by **Wilson Cassius**, **"Plaintiff"** was placed on emergency placement leave by his supervisor, **Postmaster Don Bannister**. **Don Bannister** told **"Plaintiff"** that the USPS Zero Tolerance Policy meant the victim and attacker are treated the same. **"Plaintiff"** thought this was quite unfair and perhaps a misinterpretation of the Zero Policy rule, but left the property as requested. During the EEOC mediation, the Mediator agreed with **"Plaintiff"** by saying "the USPS Zero tolerance policy was flawed and wrong to treat the innocent the same as the attacker." The Mediator ask **Don Bannister** did he think the Zero Tolerance policy was fair if the **"Plaintiff"** did nothing and was punished the same as the attacker. **Don Bannister** said that is the way the policy was written. **Don Bannister** was wrong in his interpretation of the USPS Zero tolerance policy. He treated **"Plaintiff"**; the victim, the same way as the attacker, **Wilson Cassius**, who had to be restrained by an employee to stop his attack on **"Plaintiff"**. **Don Bannister's** actions were unfair to **"Plaintiff"**. **"Plaintiff"** was the victim and did nothing wrong, but the disciplinary action for the attacker and the victim were

the same. **"Plaintiff"** Union did not help or support him. **"Plaintiff"** was not paid for his two-week emergency placement, and a letter of discipline was placed in **"Plaintiff"** file for 12 months, the exact treatment **Wilson Cassius**; the attacker received. The Union was Biased and misrepresented the facts of this situation to favor **Wilson Cassius** because he is close friends with **Tarashema Marshall** the Lithia Springs Union Steward, and **Tarashema Marshall** is a *personal* friend of the Local Union President in 2022; **Steve Wright**. **Wright** appointed **Tarashema Marshall** Union Steward in Lithia Springs; **Wright** told the Local employees that he can select whoever he wants; despite many local objections, written and verbal, and without having a vote. **"Plaintiff"** called the NALC Union and the Union President **Steve Wright** for information about this situation and **"Plaintiff"** did not receive a call back or support, in fact **Steve Wright** and the Union lied and misrepresented **"Plaintiff"** and altered the facts of this case. **Ingrid Morton** of the EEOC provided **"Plaintiff"** with the final resolution about the attack. The Union should have provided **"Plaintiff"** with that information instead of ignoring **"Plaintiff."** The Lithia Springs Union Steward, **Tarashema Marshall** is also one of the verbal abusers and therefore was equally non-supportive of **"Plaintiff."** **Marshall** called **"Plaintiff"** an "Old Ass Man" multiple times. There were about 8 employees, more than half at Lithia Springs who requested in writing to the National office that they be allowed to pick their Union Steward, but they were denied. The Union Steward was handpicked and placed in the Steward position by the Union President, **Steve Wright**. This occurred despite the multiple written letters of rejection, indicating **Marshall** was not a suitable professional for the job. Furthermore, the Union Steward, **Marshall** is allies with **Wilson Cassius**, the person who attacked **"Plaintiff"** **Marshall** is an accomplice to the other colleagues who have harassed, and verbally abused **"Plaintiff"** The Lithia Springs Post Office work environment is a "cult-like" click location. More importantly, **"Plaintiff"** has not been paid by the Post Office since the day of his wrongful emergency placement in July 2022 and it is almost 6 months later, January 2023 and still no payment. There has been no positive change in Lithia Springs since **"Plaintiff"** was attacked. USPS wants **"Plaintiff"** to return and work with an employee (**Wilson Cassius**) who screamed that he would kill **"Plaintiff"** "Old Motherfucking Ass," and saying I am about that Life; while being restrained

Rep, Ingrid Morton and to USPS HR Krystal White. They both had no comment! Human Resources and the EEO have the facts and have not shared any information with "Plaintiff" they discovered during their lengthy investigations. A cover up of major proportions is taking place.

1. **Settlement Demand:** As a result of the actions, the Plaintiff desires relief in the form of:

Payment in the amount of Seven Hundred and Fifty thousand Dollars (\$750,000).

This offer to settle the matter out of court and avoid a lawsuit is valid for 30 days from the date of this notice. If the "Plaintiff" does not receive a favorable response in 30 days, the "Plaintiff" will immediately begin a lawsuit.

2. **Governing Law.** This letter of Intent to Sue shall be governed by and construed in accordance with, the laws of the State of Georgia.

Sincerely,

Darrell R. Williams

trying to attack **"Plaintiff"** while he was spraying his saliva all over the place. USPS also want **"Plaintiff"** to work with the same people calling him discriminatory names every single day and mixing up his Mail and Packages. **"Plaintiff"** managers did nothing.

"Plaintiff" has made attempts to contact Krystal White in USPS Human Resources, she will not respond; yet they want **"Plaintiff"** to place himself in danger and work in this hostile work environment with the same horrible and scary people, or start over at another Branch with only a 90-day guarantee; when **"Plaintiff"** has done nothing wrong. Wilson Cassius has not suffered as **"Plaintiff"** has, and he is the wrong doer. **"Plaintiff"** has not been notified by Human Resources regarding the details of his case; however, HR has conducted employee interviews for about three weeks during his absence. **"Plaintiff"** would like to know USPS HR findings. There are other pending cases against some of the same cruel individuals at this Lithia Springs Branch. Lou Richardson and Crystal Smith have claims, while Michael Cole and Ellis Riley with over 50 years of service made compelling statements regarding these horrible people. Kristina Parker, Lou Richardson, and Crystal Smith all wrote letters detailing what they have heard and seen.

"Plaintiff" did have an EEOC hearing that he felt was premature as did the EEOC mediator; when the Mediator asked Ingrid Morton, the EEOC Rep., **"Ms. Morton "without Human Resources completing their investigation do you think this mediation was premature?"** Morton did not answer his question. Yes, the EEO process was premature and a sham. Ingrid Morton was clearly bias and never showed she was interested in the truth, making excuse after excuse for these people behavior. The options the EEOC provided **"Plaintiff"** with were not in his best interest and completely unfair. **"Plaintiff"** was told that he could go to another postal branch, lose earned seniority, then reapply for a position after 90 days with no guarantee of rehire or job placement. These are just unbelievable options.

"Plaintiff" should not have to lose seniority and start over at a new branch. The Post Office has allowed the attacker and verbal abusers to continue to work in Lithia Springs and earn a living. Because of **"Plaintiff"** age (63), the Post Office is discriminating against him by asking the victim to change work location and lose seniority without a guarantee of a job after 90 days and not asking the wrong doers to do anything. The Post Office has allowed these people to continue to work, harass

other employees and make Lithia Springs a hostile work environment. **"Plaintiff"** was given the same initial disciplinary action as the attacker, emergency leave; with no pay; this is just not right. The attacker, who threatened **"Plaintiff"** life has returned to the Lithia Springs location and his pay has resumed. **"Plaintiff"** is still uninformed and unsupported by the Union with his case. The Union has supported the attacker and harassers and not the **"Plaintiff,"** the victim. The cruel employees are still employed and still wreaking havoc. **"Plaintiff"** is unaware of any actions taken against the name callers and the attacker. The Lithia Springs Post Office culture, the environment, the behavior of the employees has remained the same or perhaps has gotten worse. There are other discriminatory cases being filed. **"Plaintiff"** told by **Byron Burnett**, a supervisor in Lithia Springs at the time; that there was a stack of complaints against these same ruthless employees on file in the Lithia Springs office and he forwarded them along with **"Plaintiff"** statements to USPS Human Resources. The Lithia Springs Postal Branch is an unsafe, hostile, toxic and unhealthy environment for **"Plaintiff"** to return to. There are also letters written and submitted by veteran colleagues and some relatively new colleagues to support **"Plaintiff"** case. Lastly, one of **"Plaintiff"** supervisors (**Keia Morton**), was socializing in June/July 2022, the same time period the discriminatory behavior was taking place. **Keia Morton** was with the harassers and the attacker after work hours. **"Plaintiff"** has the pictures from the Birthday party at **Andre Terrell's** home that **"Plaintiff"** submitted to **Krystal White** in USPS HR. **Keia Morton** lied to **Krystal White** in HR and **Ingrid Morton** of the EEOC saying he never socialized after work hours with the abusers, and attacker.

We believe there is an illusion that the Lithia Springs Branch will be better with the new Postmaster (**Quantez D Freeman**), but the new postmaster is friends with the verbally abusive "ring-leader" **Andre Terrell**, and seemingly supportive of his followers. Under this new Postmaster **Anita Scott** gained access to all the files relating to hers, **Terrell's**, **Cassius**, **Marshall**, and **Taylor's** terrible behavior, including all letters written by other employees condemning their horrible behavior. Once the group of abusers read the files, they invented lies to cover up their behavior, and they begin to harass and attack people who wrote truthful letters about their terrible and treacherous behavior. **"Plaintiff"** reported the file break-in to the EEOC